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November 12, 2019

ECF

Hon. P. Kevin Castel  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

Time to answer extended to November 29, 2019.  
IPTC scheduled for December 13, 2019 is VACATED.  
SO ORDERED.  
Dated: 11/13/19

A handwritten signature of P. Kevin Castel in black ink, written over a horizontal line.

P. Kevin Castel  
United States District Judge

Re: ***Katlyn Doe v. Darren K. Indyke and Richard D. Kahn as Joint Personal  
Representatives of the Estate of Jeffrey E. Epstein, et al., 1:19-cv-07771 (PKC)***

Dear Judge Castel:

We represent Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (incorrectly named herein as "Joint Personal Representatives" of the Estate of Jeffrey E. Epstein), Nine East 71st Street, Corporation, Financial Trust Company, Inc., NES, LLC, Florida Science Foundation, Inc., Maple, Inc., LSJ, LLC, HBRK Associates, Inc., and JEJE, Inc. (together, "Defendants") in the referenced action. [We write to respectfully request a two week extension of Defendants' time to answer, move or otherwise respond to Plaintiff's Complaint, from November 15, 2019 to November 29, 2019.] The Initial Pretrial Conference is scheduled for December 13, 2019. Accordingly, under the requested extended deadline, Defendants would still respond to the Complaint by 14 days before the conference. The requested extension would not affect any other scheduled dates in this action.

This is the first request for an extension of this deadline. The Court previously So Ordered the parties' agreement whereby we accepted service of Plaintiff's Complaint and setting the November 15 response deadline (ECF #31).

Plaintiff's counsel does not consent to this request, stating: "I cannot agree to extend your time to respond any further and cannot agree to postpone the conference." However, as explained above, this is the first request to extend the November 15 deadline; and we do not request an adjournment of the Initial Pretrial Conference.

Thank you for your attention to this matter.

Respectfully submitted,  
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Respectfully submitted,

s/ Bennet J. Moskowitz  
Bennet J. Moskowitz